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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEPHEN RUSSELL

Plaintiff,

v.

NIR MAMAN, et al.,

Defendants.

Case No. 18-cv-06691-RS

JOINT STIPULATION RE EXTENSION
OF CASE SCHEDULE AND ORDER AS
MODIFIED BY THE COURT

NIR MAMAN, et al.

Third-Party Plaintiffs,

v.

RONEN SHLOMO, et al.

Third-Party Defendants.

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Plaintiff Stephen Russell (“Plaintiff”), Defendants Nir Maman, Ryan Micheletti, George Akkelquist, Legion Industries, Inc. d/b/a Shield Corps Security, DFW Metroplex Training Academy, and CT707 Israeli Krav Systems, Inc. (“Defendants”), and Third-Party Defendants Ronen Shlomo and Bsecure, (collectively, “the Parties”), jointly stipulate and respectfully request that the Court extend the current case schedule by approximately 90 days for good cause shown:

WHEREAS, the Court issued the controlling case schedule on June 19, 2020, with a fact discovery deadline is March 5, 2021;

WHEREAS, despite the Parties’ diligent efforts to schedule depositions and exchange discovery, there are over a dozen depositions remaining, including several third-party depositions, the completion of the individual deposition of Defendant Nir Maman, and the Federal Rule of Civil Procedure 30(b)(6) deposition of CT707;

WHEREAS, Defendant Maman’s and CT707’s depositions were postponed due to health issues and have not yet been rescheduled due to Defendant Maman’s health;

WHEREAS, Third Party Deponents Steven Walsh and Maura Walsh failed to appear at their duly noticed depositions on February 18, 2021 and Plaintiff is attempting to meet-and-confer with the deponents;

WHEREAS, the Parties are still meeting and conferring in good faith regarding discovery responses and document productions;

ACCORDINGLY, it is therefore STIPULATED and AGREED, subject to Court approval, that the case schedule be amended as follows:

Event	Current Deadline	Deadline
Close of Fact Discovery	March 5, 2021	June 4, 2021
Deadline to Designate Experts in Accordance with FRCP 26(a)(2)	March 5, 2021	June 4, 2021

Deadline to Designate Supplemental and Rebuttal Experts	April 2, 2021	June 18, 2021
Close of Expert Discovery	May 7, 2021	July 9, 2021
Deadline for Dispositive Motions	May 20, 2021	MSJ due: August 6, 2021; Opposition due: August 20, 2021; Reply due: August 27; Hearing: September 16, 2021
Pretrial Conference	August 11, 2021	November 10, 2021
Jury Trial	August 23, 2021	November 22, 2021

DATED: February 24, 2021

Respectfully submitted,

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/s/ Warren Metlitzky

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Attorneys for Bsecure and Ronen Shlomo

ORDER

Pursuant to stipulation and for good cause shown, IT IS SO ORDERED that the case schedule shall be amended as proposed.

DATED: February 25, 2021



Honorable Richard Seeborg
Chief United States District
Judge